REMARKS

Claims 1-16, 18-21, and 23-24 remain in this application. Claims 17 and 22 have been cancelled. Claims 3, 4, 8, 10, 11, 15, 18, 20, and 23 have been amended.

The examiner has acknowledged that claims 3-5, 10-12, 17, 18, 22, and 23 are directed to allowable subject matter.

Reconsideration of this application in light of the above amendments and the following remarks is requested.

Claim Objections

Claim 15 was object to because on an informality. Claim 15 was amended to correct the noted informality, and withdrawal of the objection to claim 15 is respectfully requested.

Rejection[s] under 35 U.S.C. § 102

Claim 1

Claim 1 recites the following:

1. A method for controlling packet communications between a first network and a second network, the method comprising:

implementing a server module in a connecting node, the connecting node for monitoring one or more packets exchanged between the first and second networks;

implementing a driver module in a first node inside the first network; and

      associating, with the assistance of the server and driver modules, a network address and port used by the first node with a predetermined application, wherein the network address and port is used for sending at least one packet of the application to a second node in the second network.

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application No. 20020116502 to Iyer et al. (hereinafter referred to as "Iyer")

The PTO provides in MPEP § 2131 that

> *"[t]o anticipate a claim, the reference must teach every element of the claim...."*

Therefore, with respect to claim 1, to sustain this rejection the Iyer reference must contain all of the above claimed elements of the claim. However, contrary to the examiner's position that all elements are disclosed in the Iyer reference, Iyer does not disclose "implementing a server module in a connecting node," or for "associating, with the assistance of the server and driver modules, a network address and port used by the first node."

With regard to the claim 1 limitation of "implementing a server module in a connecting node, the connecting node for monitoring one or more packets exchanged between the first and second networks," the Office Action cites Figure 6, box 60 and the following passage of Iyer as allegedly disclosing such a method step:

> [0029] FIG. 6 shows a *computer 60 serving as a gateway 16* for routing packets 20 according to processes 30 and 40. Computer 60 includes a processor 62, a memory 64 including executable instructions 61, a protocol stack 65 and a mapping table 67, and private and public network interfaces 15 and 17. Processor 62 executes computer instruction of RAM (not shown) to implement processes 30 and 40.

Iyer, Paragraph 0029 (*emphasis added*).

Applicant respectfully disagrees. Iyer only shows a gateway (16) that routes packets and in no manner describes or suggest "implementing a server module" in the gateway. For at least this reason, Iyer is insufficient to describe or suggest a method of "implementing a server module in a connecting node, the connecting node for monitoring one or more packets exchanged between the first and second networks" and thus is insufficient to disclose each of the claim 1 limitations. Accordingly, Iyer fails to anticipate claim 1.

With regard to the claim 1 limitation of "associating, with the assistance of the server and driver modules, a network address and port used by the first node with a predetermined application, wherein the network address and port is used for sending at least one packet of the application to a second node in the second network," the Office Action cites the following

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passage of Iyer as allegedly disclosing a method of step associating, with the assistance of the server and driver modules, a network address and port used by the first node with a predetermined application:

> [0021] Network Address Translation protocol ("NAT") is a protocol that allows private clients A and B to transfer (i.e. route) packets with public client C. NAT accomplishes this by modifying (i.e. translating) the source IP address and/or ports of outbound packets transmitted from a private network to the public network. NAT maintains these modifications in a manner (e.g. a table) which enables the gateway to de-multiplex address information from inbound packets from the public network received in response to the outbound packets so that it may route the inbound packets to the appropriate private address. Heretofore, NAT required proxies (i.e. application specific software) or application level gateways (ALG) for those applications that embed IP addresses in application packets. ALG modify IP addresses and/or port in such embedded application payloads to comply with NAT requirements.

Iyer, Paragraph 0021.

Applicant respectfully disagrees. Iyer only describes a network address translation (NAT) protocol that allows translation of source addresses and ports of private clients to a public (i.e., registered) address of the private network, and vice versa. As is well known, address translations performed by NAT are unknown to private clients. Accordingly, the private client is unaware of any NAT functions and does not participate in the address translation but only provides packets to the NAT that subsequently translates the source addresses thereof. Accordingly, a driver module alleged to be disclosed by Iyer at a first node inside the first network provides no contribution for associating a network address and port with a predetermined application. For at least this reason, Iyer is insufficient to describe or suggest a method of "associating, with the assistance of the server and driver modules, a network address and port used by the first node with a predetermined application, wherein the network address and port is used for sending at least one packet of the application to a second node in the second network" and thus is insufficient to disclose each of the claim 1 limitations. Accordingly, Iyer fails to anticipate claim 1.

Amended claim 8 recites similar features as claim 1 and was rejected for the same rationale. Therefore, the same distinctions between Iyer and the claimed invention in claim 1 apply for claim 8. For the reasons described above, Iyer does not include all elements of independent claims 1 and 8 and hence fails to anticipate the present invention as recited in claims 1 and 8.

Claims 15 and 20

Claims 15 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Iyer in view of U.S. Patent No. 6,608,830 to Hirano (hereinafter referred to as "Hirano").

Claim 15 has been amended to include limitations of allowable dependent claim 17 (now cancelled). Accordingly, claim 15 is now in condition for allowance, and such a notice is respectfully requested.

Claim 20 has been amended to include limitations of allowable dependent claim 22 (now cancelled). Accordingly, claim 20 is now in condition for allowance, and such a notice is respectfully requested.

Allowable Subject Matter

The examiner has acknowledged that claims 3-5, 10-12, 17, 18, 22, and 23 are directed to allowable subject matter. Claims 17 and 22 have been cancelled, and the limitations thereof amended into respective independent claims 15 and 20. For this reason, claims 15 and 20 are now in condition for allowance.

Conclusion

It is clear from all of the foregoing that independent claims 1, 8, 15, and 20 are in condition for allowance. Dependent claims 2-7, 9-14, 16, 18-19, 21, and 23-24 depend from and further limit independent claims 1, 8, 15, and 20 and therefore are allowable as well.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

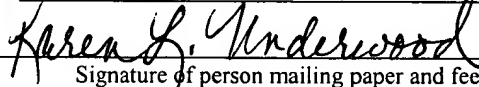Steven T. McDonald
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Dated: 25 August 2005

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